

## **REMARKS**

In the Office Action dated February 5, 2007, claims 1-4 were rejected under 35 U.S.C. §102(b) as being anticipated by Schuricht et al. This rejection is respectfully traversed for the following reasons.

The subject matter disclosed and claimed in the present application is a mail-processing device that allows a product code to be automatically retrieved from a memory, upon the entry of shipping information into the mail-processing device and to supply, as an output, text for the product description for generating a printout thereof.

The term "product code" is a term with a specific, well-documented meaning in the context of mail processing. As explained in the first full paragraph at page 3 of the present specification, a product code is a specific definition pertaining to a specific mailing category that is defined by the governmental postal authorities in some countries, such as in Germany and in Canada. The product code designates additional services, beyond basic mailing, that are requested by the mailer, such as overnight delivery, registered mail, etc. The product code must be included in the franking imprint according to the postal regulations in these countries, but this code is simply a number and therefore does not, by itself, provide explanatory information to a user who has not memorized all of the relevant product codes. As explained at page 3 of the present specification, this therefore necessitates extra steps by the user in generating the franking imprint.

A copy of relevant pages from the document entitled "FRANKIT: New Generation Digital Franking," Version 1.3, May 15, 2003, published by Deutsche

Post, is attached hereto as Exhibit "A", describing the product code and the requirements for its inclusion in the franking imprint.

The United States, via the USPS, currently does not require such a product code. The Examiner can verify this if the Examiner wishes by reviewing the USPS Knowledge Base at <http://pe.usps.com> and the documentation of United States postal rates at <http://www.usps.com/rates/welcome.htm>.

In accordance with the present invention, all of the available services from the postal authority are displayed to the user in a menu. The user then selects the desired service from the menu. It still remains, however, to identify the postal authority-defined product code for the selective service. Conventionally, this would have required the user to then peruse another menu showing the product codes, and the user would then have to select the appropriate product code. In accordance with the present invention, this extra step on the part of the user is eliminated by automatically identifying and selecting the appropriate product code, from a stored table, simply upon the initial entry by the user of the appropriate shipping information.

Applicant respectfully submits that such an apparatus is not disclosed or suggested in the Schuricht et al. reference. This is for several reasons.

The patent that issued as the Schuricht et al. reference was originally filed on May 15, 1989, which was long before any type of governmentally-defined product codes were in existence. Therefore, the Schuricht et al. reference does not and could not concern such governmentally-defined product codes. Moreover, the Schuricht et al. reference is assigned to a United States company, and as noted above, even as of today such product codes are not required in the United States.

Therefore, there was no reason for Schuricht et al. to include anything in the device disclosed in the Schuricht et al. reference that would facilitate the identification of a governmentally-defined product code that is associated with a selected level of service.

This is also made clear in the text of the governmentally-defined reference itself, at column 2, lines 37-39 and 45-49, which explicitly require manual entries in order to retrieve the stored information. It is true that the Schuricht et al. reference discloses *storage* of certain types of codes associated with certain types of services but, for the reasons noted above, these are not and cannot be governmentally-defined product codes. Even if the Examiner considers the stored alphanumeric information in Schuricht et al. to conform to some type of generic product code, there is no automatic retrieval of that product code for inclusion in the franking imprint disclosed in the Schuricht et al. reference. Retrieval of those codes in Schuricht et al. still requires an additional manual entry, which is avoided in accordance with the present invention.

In the apparatus disclosed and claimed in the present application, the determination of the product code proceeds automatically in the "background" after the user has entered the appropriate shipping information. This is described in the present specification at page 4, line 17 through page 5, line 5.

The Schuricht et al. reference, therefore, does not disclose all of the elements of claim 1 as arranged and operating in that claim, and therefore does not anticipate claim 1, nor any of claims 2-4 depending therefrom.

Early reconsideration of the application is respectfully requested.

The Commissioner is hereby authorized to charge any additional fees which may be required, or to credit any overpayment to account No. 501519.

Submitted by,



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